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By Certified Mail  
Return Receipt Requested

December 3, 2014

Alfred Teo  
Chief Executive Officer  
Sigma Plastics Group  
President  
Omega Extruding Corp. of California  
Page & Schuyler Avenues, Bldg. #5  
Lyndhurst, NJ 07071-0808

James Gifford  
Agent for Service of Process  
Omega Extruding Corp. of California  
9614 Lucas Ranch Road  
Rancho Cucamonga, CA 91730

Fred Stabile  
Plant Manager  
Sigma Stretch Film  
A division of Sigma Plastics Group  
1576 Omaha Ct.  
Riverside, CA 92507

**Re: Notice of Intent to File Citizen Suit Pursuant to the Federal Clean Water Act**

**Facility:** Sigma Stretch Film  
A division of Sigma Plastics Group  
1576 Omaha Ct.  
Riverside, CA 92507  
WDID No. 8 331020886

**Basin Plan:** Water Quality Control Plan for the Santa Ana River Basin

**Receiving Water:** Santa Ana River

Gentlemen:

On behalf of the Plastic Pollution Coalition, a project of the Earth Island Institute (collectively, "PPC"), whose address is 2150 Allston Way #460, Berkeley, California 94704, and telephone number is (510) 859-9100, I write regarding violations under the federal Clean Water Act ("CWA") by Sigma Plastics Group and its divisions, including Sigma Stretch Film and Omega Extruding Corporation of California (collectively, "Sigma"), with regard to the facility

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located at: 1576 Omaha Ct., Riverside, CA 92507 (the "Facility"). The purpose of this letter is to provide Sigma and its officers/managers named above with notice of these violations and notice of PPC's intent to file a lawsuit against Sigma and the individuals named above in sixty (60) days under the CWA in Federal District Court. 33 U.S.C. § 1365(a)(1).

The Clean Water Act prohibits the discharge of stormwater from industrial activities except as allowed pursuant to a permit. *See* 33 U.S.C. §§ 1311(a), 1342; 40 C.F.R. § 126(c)(1). PPC intends to file suit for Sigma's ongoing failure to comply with the procedural and substantive conditions of the State of California's National Pollutant Discharge Elimination System General Permit No. CAS000001, California Regional Water Quality Control Board, Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities ("Stormwater Permit").

Sigma consistently has violated the Clean Water Act over the last 5 years, including in the wet season for 2013-2014. In signing the Notice of Intent ("NOI") to comply with the Stormwater Permit, Sigma's officers certified to the State of California that Sigma had read the permit and was in compliance with its requirements. However, as detailed below, information available to PPC indicates that Sigma has routinely failed, and continues to fail, to comply with many of the basic reporting, filing, and monitoring requirements of the Stormwater Permit and has discharged, and continues to discharge, pollutants unlawfully from the Facility. In addition to the violations explicitly noted herein, this notice letter ("Notice") covers all CWA violations of the same type evidenced by information that becomes available after the date of this Notice.

Based on review of the Water Board's records, Omega Extruding Corporation of California is the operator of the Facility--Sigma Stretch Film; and the Secretary of State records indicate James Gifford is the registered agent for service of process for Omega. This letter puts Sigma, Alfred Teo, James Gifford, and Fred Stabile, on notice of violations and is being sent to you as the responsible owners, officers, and/or operators of the Facility, or as the registered agent for the individual and entity addressees/recipients of this notice.

#### **I. Sigma Background**

Based on our investigation, Sigma has been operating the Facility at its present location since at least 2007. The company certifies in its NOI to comply with the Stormwater Permit that it is classified under SIC code 3089 (plastic products) and its most recent Storm Water Pollution Prevention Plan (apparently last updated in 2012, hereinafter referred to as the "SWPPP") indicates it is classified under SIC code 3080 (miscellaneous plastic products).

Sigma engages in extensive manufacturing of plastic wrapping at the Facility, using polyethylene polymer plastics that are passed through a multicolor flexographic printing press. The company claims to provide "Quality, Innovative Hand and Machine Stretch Film Programs for a Broad Range of Transportation Environments." At any given time, Sigma stores onsite, for manufacturing purposes, *over a million pounds of polyethylene*, the most commonly used plastic in commercial packaging such as plastic film, plastic bags, bottles, etc. The industrial processes



result in pollutants, and the Facility utilizes hazardous waste drums and totes. Sigma collects and discharges storm water from its Facility into channels that flow into the Santa Ana River.

Sigma on at least two occasions has triggered scrutiny by the Water Board for noncompliance with its Stormwater Permit. On August 19, 2013, the Santa Ana Regional Water Quality Control Board ("Regional Water Board") conducted a field investigation of the Facility and observed plastic pellets (*i.e.*, nurdles) spilled and littered onsite. On July 25, 2010 the Water Board sent a Notice of Noncompliance to Sigma because it failed to submit an annual report. Despite these warnings, Sigma continues to discharge unacceptably high levels of pollutants and to otherwise violate the CWA.

Sigma's CWA violations are acutely concerning because the surrounding community within three (3) miles of the Facility is comprised of 73% minority groups with over 40% of the population below the poverty level. Low-income and minority communities historically have been disproportionately impacted and plagued by environmental health threats. The failure of Sigma to comply with the CWA exacerbates this environmental justice problem.

## **II. Sigma's Violations of the Clean Water Act and Stormwater Permit**

Our investigation, including a review of Sigma's annual reports submitted to the State Water Resources Control Board and/or the Regional Water Board, indicates that Sigma routinely discharges from the Facility water that violates effluent limitations, pollutes a receiving water, and likely causes contamination and adverse impacts to the environment in violation of the Water Quality Control Plan for the Santa Ana River Basin ("Basin Plan"). Sigma also routinely fails to engage in monthly visual observations of stormwater discharges at the Facility. Finally, site operations include open dumpsters and various industrial refuse or materials that are exposed to stormwater.

The Stormwater Permit governs storm water discharges by among other things:

- Prohibiting the discharge of storm water pollutants that cause or threaten to cause pollution, contamination, or nuisance. Discharge Prohibition A.2.
- Requiring facilities to reduce or prevent pollutant associated with industrial activities in storm water with best available technology economically achievable, "BAT," for toxic pollutants and best conventional pollutant control technology, "BCT," for conventional pollutants.<sup>1</sup> Effluent Limitation B.3.

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<sup>1</sup> The Environmental Protection Agency ("EPA") has established benchmarks for pollutant discharges, which serve as the parameters to determine if a facility is properly implementing safeguards and procedures to prevent unlawful discharges. 65 Fed. Reg. 64746, Table 3. These benchmarks are relevant and an objective standard to evaluate whether a facility has implemented the requisite BAT and BCT. As discussed herein, Sigma has violated the EPA benchmarks.

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- Prohibiting storm water discharges and authorized non-storm water discharges to surface water or groundwater that adversely impact human health or the environment. Receiving Water Limitation C.1.
- Prohibiting storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of an applicable water quality standard.<sup>2</sup> Receiving Water Limitation C.2.

As discussed in detail below, Sigma is violating all of the above provisions.

*A. Unlawful Discharges of Contaminated Storm Water*

Samples of storm water discharged from Sigma demonstrate exceedances of the EPA's benchmarks, the Water Board standards, and/or the Basin Plan's water quality standards limits and over 20 times in the last 5 years. See Exhibit A (listing numerous discharges). Stormwater discharges from the Facility in violation of the Stormwater Permit include: total suspended solids (TSS) as high as 1250 mg/L and in excess of the EPA benchmark of 100 mg/L; oil and grease as high as 26 mg/L and in excess of the EPA benchmark value of 15 mg/L; and pH values as low as 5.6 s.u. and below the EPA benchmark value and Water Board's acidity cutoff of 6.50 s.u. *Id.*; see also Sigma's Annual Storm Water Discharge Report 2009-2010 ("2009-2010 Annual Report"); Sigma's Annual Storm Water Discharge Report 2011-2012 ("2011-2012 Annual Report"); and Sigma's Annual Storm Water Discharge Report 2013-2014 ("2013-2014 Annual Report"). In short, excessive levels of pollutants have been discharged by the Facility, on an ongoing basis, into stormwater over the past 5 years. Not only are these sample results indicative of violations of effluent limitations, they indicate discharges of pollutants and materials other than storm water in violation of the Stormwater Permit. These pollutants are known to degrade water quality and have adverse effects on aquatic life and habitats in the Santa Ana Basin.

To date, Sigma has not revised its SWPPP to address these routine violations of the Storm Water Permit. The failure to do so violates Limitation C.3 of the Permit, and these violations have continued since the first exceedances of the EPA Benchmarks and other standards on or before December 7, 2009.

Each instance of a discharge of storm water in violation of discharge prohibitions, receiving water limitations, and/or effluent limitations is a separate and distinct violation off the Storm Water Permit and the CWA. See 33 U.S.C. § 1311(a). Sigma and its officers and agents are liable under the CWA for these violations that are ongoing and will likely continue.

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<sup>2</sup> Water quality standards are established in the San Francisco Bay Basin, Region 2, Water Quality Control Plan ("Basin Plan"), amended as of December 31, 2011, available at: [www.waterboards.ca.gov/rwqcb2/basin\\_planning.shtml](http://www.waterboards.ca.gov/rwqcb2/basin_planning.shtml) (last accessed July 25, 2013).



*B. Failure to Adequately Sample and Analyze Storm Events from Each Discharge Point*

With certain limited exceptions, the Stormwater Permit requires that each covered facility sample *two* storm events per wet season from *each* of its stormwater discharge locations. Stormwater Permit, Sections B.5.a and B.7.a. In addition, facility operators must collect stormwater samples from the *first* storm event of the wet season. *Id.* In the wet season for 2012-2013, Sigma failed to analyze and inspect stormwater samples from the *first* rain event in the wet season. 2012-2013 Annual Report. Sigma alleged the first qualifying rain event for the 2012-2013 wet season was sampled and then tested in December 2012. The first qualifying rain event under the CWA, however, occurred on Thursday, October 11, 2012. Sigma nonetheless falsely certified in its 2012-2013 Annual Report that it has sampled "the first rain event." 2012-2013 Annual Report, Certification.

In 2009-2010, Sigma for its second stormwater event (January 18, 2010) had testing done on samples allegedly taken from three locations at the Facility, described as: the back side building, front inside yard, and front street. 2009-2010 Annual Report. For the first event (December 7, 2009), however, testing was only performed on samples allegedly taken from two of those locations, combining samples from the front inside yard and street. By the 2010-2011 Annual Report, Sigma had formally attempted to reduce its number of discharge locations sampled. See 2010-2011 Annual Report, p. 2. However, the only justification provided was that the street site allegedly "did not get enough flow," which is an insufficient basis upon which to remove a sample location. See Stormwater Permit, Section B.7.d (reduction only allowed where two or more drainage areas are "substantially identical" and reduction requires documentation of this determination in the annual report). By 2011-2012 (and in each subsequent annual report), Sigma failed to even mention that a third discharge location had ever existed. See 2011-2012 Annual Report, pp. 2-3.

Each instance of a discharge of storm water in violation of sampling requirements is a separate and distinct violation off the Storm Water Permit and the CWA. See 33 U.S.C. § 1311(a). Sigma and its officers and agents are liable under the CWA for these violations that are ongoing and will likely continue.

*C. Failure to Develop, Implement, and Revise an Adequate Storm Water Pollution Prevention Plan*

All facilities covered under the Storm Water Permit, including Sigma, must develop and implement a SWPPP. NPDES Permit, Section A.1. The SWPPP must identify and evaluate the sources of pollutants associated with industrial activities that may affect the quality of storm and non-storm water discharges. The SWPPP also must identify and implement site-specific best management practices ("BMPs") to reduce or prevent pollutants associated with industrial activities in stormwater and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are ineffective; and the SWPPP must include BMPs that achieve BAT and BCT. *Id.*, Sections A.2 and B.3.

Requirements under the SWPPP are further detailed as it must include:

- a site map showing the facility boundaries, storm water drainage areas with flow patterns, nearby water bodies, the location of the storm water collection, conveyance and discharge system (and the direction of flow for discharges), structural control measures, areas of actual and potential pollutant contact, areas of industrial activity, and an outline of all impervious areas of the facility (*id.*, Section A.4);
- a list of significant materials handled and stored at the site and a description of where that material is being stored, received, shipped, and handled, as well as the quantities and frequency; and a list of all significant raw materials, intermediate products, final or finished products, recycled materials, and waste or disposed materials (*id.*, Section A.5);
- a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of significant spills and leaks, a list of all non-storm water discharges and their sources and a description of locations where soil erosion may occur (*id.*, Section A.6); and
- an assessment of all industrial activities and potential pollutant sources (*id.*, Section A.7).

Our investigations of the facility indicate that Sigma has not developed or implemented a SWPPP that meets the foregoing requirements. Sigma's site map is handwritten, rudimentary, and fails even to identify the Facility boundaries and provides no detail whatsoever on the west side of the Facility where most of the exposed industrial processes are located. Sigma further has failed, and continues to fail, to identify all significant materials and to develop and implement adequate BMPs to prevent the exposure and subsequent discharge of pollutants at levels that do not impair the receiving water. Investigations, including visual observations from satellite and overhead imagery, indicate the Facility has wastes and industrial activities that are exposed to rainfall and not covered with structural BMPs. The SWPPP erroneously identifies the Los Angeles River as the receiving body for discharges from the Facility that appear instead to run into the Santa Ana River. SWPPP, p. 3. Finally, the SWPPP site map fails: to show the outline of all storm water drainage areas within the Facility; to show the portions of the drainage area impacted by run-on from surrounding areas; to indicate the locations of impervious areas, locations where materials are exposed to precipitation; to indicate drains, drainage flows, municipal storm drain inlets, and nearby water bodies; and to show the areas of industrial activity and supporting details. *Id.*, Section A(4); SWPPP, Site Map. These deficiencies render the SWPPP inadequate.

Sigma's SWPPP does not include a complete list of significant materials. Stormwater Permit, Section A.5. For instance, although oil is mentioned several times in the SWPPP, and the SWPPP states a need for copper and zinc testing, none of these materials is included in the List of Significant Materials. SWPPP, p. 9.



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Sigma's SWPPP does not include a narrative description of the facility's industrial activities, or an adequate narrative description of the BMPs to be implemented. Stormwater Permit, Section A.6, A.8. For example, the SWPPP does state that oil leaks are possible at some undisclosed location of "plant/outside," but then offers the inappropriate response plan to "vacuum all the spills." SWPPP, p. 18.

Sigma has not developed or implemented its SWPPP as necessary to ensure compliance with effluent and discharge limitations, in violation of the Storm Water Permit. Stormwater Permit, Sections A.9 and A.10. Sigma therefore has been daily and continuously in violation of its SWPPP requirements every day since at least December 8, 2009.

*D. Continuing Violations without an Adequate SWPPP*

Despite continuing violations of the Stormwater Permit, Sigma has not revised its SWPPP as necessary to ensure compliance with effluent and discharge limitations. Every day that the Facility operates without revising and correcting the deficiencies in its SWPPP is a separate and distinct violation of the CWA and Stormwater Permit. See Stormwater Permit, Sections A.9 and A.10. Sigma therefore has been daily and continuously in violation of its SWPPP requirements every day since at least December 8, 2009.

*E. Failure to Analyze for All Likely Pollutants in Stormwater*

Sigma has failed to analyze its stormwater for all likely pollutants. The Storm Water Permit requires facilities to sample and analyze for all toxic chemicals and other pollutants that are likely to be present in storm water discharges in significant quantities as well as for specific analytical parameters associated with a facility's industry. Stormwater Permit, Section B.5.c(ii) and (iii). Sigma identifies the need to sample heavy metals such as copper and zinc as well as total hydrocarbons. See SWPPP, p. 13. Yet Sigma has failed to sample and test for copper, zinc, and total hydrocarbons for the last five years straight. 2013-2014 Annual Report; 2012-2013 Annual Report; 2011-2012 Annual Report; 2010-2011 Annual Report; and 2009-2010 Annual Report. The last time Sigma tested for copper, for example, was in the 2007-2008 wet season and the result was 3.3 mg/L – 50 times above the EPA benchmark level for copper of 0.0636 mg/L. All facilities covered by the Stormwater Permit must analyze samples for "all toxic chemicals and other pollutants that are likely to be present." Stormwater Permit, B.5.c. Sigma has not even sampled for toxics and pollutants it identified in its own SWPPP.

Any failure to analyze all likely pollutants is ongoing, and every day Sigma fails to adequately examine all significant pollutants discharged into its stormwater is another violation of the CWA and Stormwater Permit.

*F. Reporting Violations and Failure to Make Monthly Observations of Stormwater Discharges*

The Stormwater Permit requires visual observation of all discharge locations for one storm event of each of the eight months of the wet season. Stormwater Permit, Section B.4.

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Visual observation must take place during the first hour of discharge on the first day of discharge that is preceded by at least three working days without discharge. *Id.*

Sigma failed to meet these requirement and the company's monthly visual observations in its annual reports are incomplete, riddled with errors, and misleading. Specifically:

- **In the 2013-2014 Wet Season**, Sigma certified that it made all required visual observations of stormwater in each of the eight months of the wet season. *See* 2013-2014 Annual Report. Sigma's plant manager, however, represents that visual observations were made on December 3, 2013 and on March 4 and April 5 of 2014, all days on which there was *no* rain. *Id.* There was rain on numerous occasions during those months on which Sigma could have and was required to make observations.<sup>3</sup> Sigma also appears to represent that it made visual observations of stormwater in all eight (8) months of the wet season, including observations on January 7, 2014, and May 1, 2014, two months for which there was no rain at all. *Id.*
- **In the 2012-2013 Wet Season**, Sigma shows further evidence of unreliable reporting. Sigma's plant manager represents that visual observations were made on October 9 and November 7 of 2012 and on February 7, March 6, and April 10 of 2013, all days on which there was *no* rain. 2012-2013 Annual Report. Again, there was rain on numerous occasions those months on which Sigma could have and was required to make monthly stormwater observations.
- **In the 2011-2012 Wet Season**, Sigma fails no better. Sigma's plant manager represents that visual observations were made on December 1, 2011 and on January 4, February 3, March 5, and April 3 of 2012, all days on which there was *no* rain. 2011-2012 Annual Report. There was rain on numerous occasions those months on which Sigma could have and was required to make monthly stormwater observations. Hence, Sigma made no required monthly visual reports in the 2011-2012 wet season after November. Sigma nonetheless submits and certifies a 2011-2012 annual report that attests to compliance with all reporting requirements.
- **In the 2010-2011 Wet Season**, Sigma's plant manager reports there was no rain from January 2011 through May 2011. 2010-2011 Annual Report. This is false. NOAA records, which are verifiable for litigation purposes, show significant rain events in Riverside every month from January to May 2011, on numerous occasions, with ample opportunity for Sigma to make its required monthly visual observations of stormwater discharges.

Despite its certification otherwise, Sigma failed to visually observe stormwater discharges each month of the wet seasons, and instead falsely submitted reports demonstrating a blatant disregard for CWA compliance.

Each instance of a failure to observe monthly stormwater discharges in the wet season is a separate and distinct violation of the Stormwater Permit and the CWA. *See* 33 U.S.C. §

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<sup>3</sup> Rain records are easily available and can be verified on the National Oceanic and Atmospheric Administration's ("NOAA") National Climatic Data Center. *See* [www.ncdc.noaa.gov](http://www.ncdc.noaa.gov).



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1311(a). Sigma and its officers and agents are liable under the CWA for these violations that are ongoing and will likely continue.

*G. Failure to Certify and File True and Accurate Annual Reports*

The CWA and Stormwater permit require that covered facilities submit an annual report by July 1<sup>st</sup> of each year to the Executive Officer for the Regional Water Quality Control Board responsible for the area (the Annual Report). Stormwater Permit, Section B.14. Facilities must include in their Annual Reports an analysis of stormwater sampling and an evaluation of the storm water controls. *Id.* Finally, the Annual Report must be signed and certified by an appropriate corporate officer. Stormwater Permit, Sections B.14, C.9., and C.10.

Sigma routinely fails to have a corporate officer sign its annual reports. For the last three wet seasons, Charleen Zoumalan, an outside consultant, has signed Sigma's annual reports. *See* 2013-2014 Annual Report; 2012-2013 Annual Report; and 2011-2012 Annual Report. This is a violation of the Stormwater Permit. Stormwater Permit, Section C.9 (annual report must be signed by a responsible corporate officers, such as a "president, secretary, treasurer, or vice president" or a manager of the facility).

As discussed above, Sigma has not complied with a numerous provisions under the CWA and required by the Stormwater Permit. Nonetheless, Sigma and its officers or managers for the past 5 years have inaccurately signed and certified Sigma's Annual Reports or failed to submit certifications. These false or missing certifications constitute violations of the CWA and the Stormwater Permit. Each instance of Sigma failing to submit a complete or correct Annual Report, and every time Sigma or its agent inaccurately purported to comply with Stormwater Permit requirements, subjects Sigma to penalties under the CWA. *See* Stormwater Permit, Sections A.9.d, B.14, C.9, and C.10.

**III. Conclusion**

Pursuant to the CWA, PPC intends to pursue civil penalties against Sigma for the violations described above, an injunction against Sigma to cease continuing violations, and recovery from Sigma of attorneys' and experts' fees and costs associated with this enforcement action. *See* 33 U.S.C. § 1319(d) (civil penalties); 40 C.F.R. §19.4 (adjustment of civil monetary penalties for inflation); 33 U.S.C. §1365(a) (injunctive relief); and 33 U.S.C. § 1365(d) (recovery of attorney fees and expert fees). Each separate violation of the CWA occurring during the period commencing five years prior to the date of the notice of intent to file suit subjects the violator to a penalty. The CWA authorizes civil penalties of up to \$37,500 per day per violation for CWA violations after January 12, 2009.

At the end of the 60-day notice period, PPC intends to file a citizen suit under the CWA against Sigma and its agents. PPC is willing to discuss effective remedies for the violations noted in this letter prior to filing suit. However, PPC does not intend to delay filing a complaint in federal court and therefore requests that Sigma contact us promptly if it wishes to engage in discussions in the absence of litigation.

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Please direct all communication related to this matter to James Birkelund, attorney for PPC, at:

James Birkelund  
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Sincerely,



James M. Birkelund  
Attorneys for Earth Island Institute

Cc via U.S. Mail:

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**EXHIBIT A**  
**Instances of Reported Violations**  
**Storm Water Discharges**

Wet Season	Parameter	Sample Location (discharge point)	U.S. EPA Benchmark (mg/L)	Facility Concentration in Discharge (mg/L)
2013-2014	TSS	Front	100	1250
	TSS	Backside	100	1250
	TSS	Backside		1108
	pH	Backside	6.5-9.0 s.u.*	6.13 s.u.
	pH	Front	6.5-9.0 s.u.*	5.7 s.u.
	O&G	Backside	15	24
	NO TESTING FOR COPPER, ZINC, OR TOTAL HYDROCARBONS			
2012-2013	NO TESTING FOR COPPER, ZINC, OR TOTAL HYDROCARBONS			
	NO TESTING FIRST RAIN EVENT OF SEASON			
2011-2012	TSS	Front side	100	341
	pH	Backside	6.5-9.0 s.u.*	5.86 s.u.
	SC	Backside	200 µmhos/cm	210 µmhos/cm
	NO TESTING FOR COPPER, ZINC, OR TOTAL HYDROCARBONS			
2010-2011	O&G	Backside	15	20.4
	O&G	Frontside	15	26.0
	pH	Backside	6.5-9.0 s.u.*	6.02 s.u.
	pH	Backside	6.5-9.0 s.u.*	6.24 s.u.
	pH	Frontside	6.5-9.0 s.u.*	6.06 s.u.
	pH	Backside	6.5-9.0 s.u.*	5.86 s.u.
	pH	Backside	6.5-9.0 s.u.*	5.86 s.u.
	NO TESTING FOR COPPER, ZINC, OR TOTAL HYDROCARBONS			
2009-2010	TSS	Backside	100	115
	TSS	Front Inside Yard and Street	100	178
	pH	Front Inside Yard	6.5-9.0 s.u.*	5.9 s.u.
	pH	Front Inside Yard	6.5-9.0 s.u.*	5.9 s.u.
	pH	Front Street	6.5-9.0 s.u.*	6.1 s.u.
	pH	Front Street	6.5-9.0 s.u.*	6.0 s.u.

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Wet Season	Parameter	Sample Location (discharge point)	U.S. EPA Benchmark (mg/L)	Facility Concentration in Discharge (mg/L)
	pH	Backside of Building	6.5-9.0 s.u.*	5.6 s.u.
	NO TESTING FOR COPPER, ZINC, OR TOTAL HYDROCARBONS			

\* pH values based on Water Board's acceptable standards of 6.5-9.0 s.u.